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5 || Attorney for Enrique Quintero

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

21 Plaintiff United States of America, by and through their counsel Assistant United States
22 Attorney, Thomas O'Connell, and defendant Enrique Quintero, by and through his attorney Michelle
23 D. Spencer, hereby stipulate and agree that, subject to the Court's approval, that the status conference
24 currently scheduled for March 19, 2012 should be continued to April 16, 2012.

25 The parties further stipulate that time should be excluded under the Speedy Trial Act from
26 March 19, 2012 through April 16, 2012 so that defense counsel can conduct additional investigation

1 essential to the resolution of this case.

2
3 IT IS SO STIPULATED.

4 MELINDA HAAG
United States Attorney

5 Date: March 14, 2012

6 /S/
7 THOMAS O'CONNELL
Assistant United States Attorney

8 Date: March 14, 2012

9 /MDS/
10 MICHELLE D. SPENCER
Attorney for Enrique Quintero

11
12 [PROPOSED] ORDER

13 Based upon the foregoing stipulation of the parties, and good cause appearing therefor, the
14 Court finds that failing to exclude the time from March 19, 2012 through April 16, 2012 would
15 unreasonably deny the defendant continuity of counsel and the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence pursuant to 18 U.S.C. §
17 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
18 March 19, 2012 through April 16, 2012 from computation under the Speedy Trial Act outweigh the
19 best interests of the public and the defendant in a speedy trial.

20 Therefore, IT IS HEREBY ORDERED that the time from March 19, 2012 through and
21 including April 16, 2012 shall be excluded from computation under the Speedy Trial Act.

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23 Date: March 15, 2012

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HON. EDWARD J. DAVILA
United States District Judge

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